

## **EXHIBIT D**

Pechner Deposition

Combative, Speeches and Diatribes

1. Pages 609-610:

23 Q. When did you do that?

24 A. Because Patty Carey and Chuckie

1 Callahan didn't want anybody to see this

2 because they're the chief's people, and that's

3 it. That's my answer.

4 Q. When did you do that?

5 A. I don't remember the date.

6 Q. Was it in 1999?

7 A. I don't remember the date.

8 Q. Was it in 2000?

9 A. You asked the question. I answered

10 it. Carry on.

11 Q. Was it in 2001?

12 A. (Witness shrugs.)

13 MR. DILDAY: You have to give him a

14 verbal statement instead of the shrug.

15 A. I answered. I don't know when it

16 was.

2. Page 658:

1 Q. Did he call your children names

2 over a period of a couple years?

3 A. Let's just say he didn't have the

4 best behavior on the job. That's all. I

5 mean --

6 Q. My question was, Did he call your

7 children names over a period of a couple of

8 years?

9 A. Sure.

10 Q. Okay. And did this start in '96?

11 A. Yes.

12 Q. Did it continue in '97?

13 A. He called them a couple -- probably

14 said it a couple times. I don't know. No.

15 Might not have been '97.

16 Q. Did it happen in --

17 A. All I know is that Officer John

18 Burns called my kids derogatory names. I

19 don't remember the dates. I don't remember

20 the time. So you can go on to your next

21 question, because I don't know why it's not in

22 the complaint. I don't know why he called my

23 kids the names he did. Maybe he's got mental  
24 problems too.

3. Page 663:

2 Q. All right. How long before you got  
3 pregnant with Kenisha had you met Mr. Todd?  
4 How long had you known him?

5 A. None of your business. How do you  
6 like that for an answer?

7 Q. Well, I'd prefer a factual answer  
8 that's responsive to the question. Are you  
9 refusing to answer?

10 A. I'm refusing to answer.

4. Pages 679-680:

12 MR. PORR: Madam reporter, would  
13 you mark the record.

14 A. Because now all you want to know is  
15 my sex -- I went through this with the police  
16 department. You're supposed to be  
17 representing the mayor and the chief. What my  
18 sexual preference and my sexual -- who I had  
19 sex with has nothing to do with you. It's  
20 none of your business. It's none of this

21 case's business. Because I was sexually  
22 harassed on the job instead of doing an  
23 investigation as to why I was sexually  
24 harassed -- not only sexually harassed but  
1 sexually assaulted, you want to use who I had  
2 sex with, because I had sex, because I had a  
3 child when I was 16 years old, so I deserve to  
4 be sexually assaulted and harassed on the job?

5 Q. Are you done?

6 A. I hope you can come up with more  
7 than that. Okay?

8 Q. Are you done?

9 A. I'm done. I'm done.

5. Pages 740-743:

23 Q. The quote in your notes is  
24 different from the quote in the January '99  
1 report and in your complaint. Which one is  
2 accurate?

3 A. I'm confused. Why don't you ask  
4 Officer Mangino, do a little investigative  
5 work and find out for yourself.

6 Q. Ms. Pechner, your notes from 2001  
7 have a quote.

8 A. Stop trying to discredit me and get  
9 the facts. I mean, why don't you do a little  
10 bit of investigative work, get the facts on  
11 the case, and stop trying to discredit me.

12 That's what was said. There's my  
13 notes. I wrote that down. You have my notes  
14 here. You have this. I mean, in all due  
15 fairness, talk to Officer Mangino. She'll be  
16 more than happy to tell you.

17 I mean, I understand that you have  
18 a job. But, you know, I mean, in all due  
19 respect, Attorney Porr, people are dying in  
20 Iraq over this. This is my civil rights here.  
21 I mean, you know, this is ridiculous to ask  
22 questions.

23 What about the questions that  
24 matter in this case here? I mean, that  
1 personally attack me? I mean, I'm not trying  
2 to take your time up here, but you're talking  
3 about an error here that says when the  
4 department had all men, that was, of course,  
5 back to the good old days. That's what Chief  
6 Russo said.

7           That's what we internalized as  
8   females when we first got on that job. We  
9   also internalized that by the fact that there  
10   were seven female officers and the male  
11   officers, Kevin Colannino, were put in front  
12   of us because of a seniority issue.

13           So we're taking the stuff as the  
14   chief when we first get on the job that, hey,  
15   look it, this is what the chief thinks, who is  
16   now my husband, was in the union when I first  
17   got on the job.

18           I got an earful from him because he  
19   was in charge of when all this stuff was going  
20   on when we had to file a grievance for our  
21   seniority. He heard the comments from Russo.  
22   I'm not going to fabricate anything. This is  
23   a typo. This is something that I made up.  
24   This came from the captains.

1           I'm just simply saying to you why  
2   don't you ask Officer Mangino. I'm sure  
3   she'll give you the answer.

4           Q.   Are you done?  
5           A.   I'm done.

6 MR. PORR: Motion to strike. Mark

7 the record.

8 A. The truth hurts. And the truth

9 will always always prevail. Okay? So strike

10 whatever you want.

11 Q. Are you done?

12 A. I'm done.

13 MR. PORR: Motion to strike.

14 A. But I'm going to speak and say what

15 I want to say, whether it's your day or not.

16 I want you to know the truth and the truth is

17 going to prevail. Win or lose. So go ahead.

18 Go right ahead.

19 Q. Are you done?

20 A. I'm all set.